

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)

Revision of the Commission's Rules)
To Ensure Compatibility with)
Enhanced 911 Emergency Calling Systems)

CC Docket No. 94-102

**SPRINT CORPORATION
TWELFTH QUARTERLY
E911 IMPLEMENTATION REPORT**

Luisa L. Lancetti
Vice President, Wireless Regulatory Affairs
Charles W. McKee
General Attorney

SPRINT CORPORATION
401 9th Street, N.W., Suite 400
Washington, D.C. 20004
202-585-1949

November 1, 2004

SUMMARY

Sprint is pleased to report on its continued efforts regarding the deployment and activation of Phase I and II enhanced 911 systems across the United States. Sprint has now launched Phase I services in 2,200 PSAPs and deployed Phase II services in 1,147 PSAPs. The following are highlights of Sprint's accomplishments to date:

- Sprint was the first and only carrier to begin selling GPS enabled devices on October 1, 2001.
- Sprint was the first carrier to deploy a handset based Phase II operating system – deploying service covering the State of Rhode Island in December 2001.
- Sprint was the first to complete installation of all the national platforms, switch and cell site upgrades required to support Phase II E911 service across its entire nationwide network on June 14, 2002, more than a month ahead of the FCC's deadline. Sprint has been capable of supporting Phase II implementations nationwide for more than two years.
- Sprint was the first and only carrier to effectively convert 100% of all new handset activations to GPS enabled devices, reaching 99% of new handset activations in June 2003.
- Sprint has offered more than forty different GPS enabled handset models since October 1, 2001. Indeed, many older Phase II handsets have been phased out of the current handset lineup as obsolete.
- Sprint has sold over 29 million GPS-enabled handsets since October of 2001.
- Sprint deployed 68 new Phase I PSAPs during the third quarter of 2004, for a total of 2,200 Phase I PSAPs in portions of forty-two states and the District of Columbia.
- Sprint deployed 106 new Phase II PSAPs during the third quarter of 2004, for a total of 1,147 PSAPs in portions of thirty-two states and the District of Columbia.

As the figures above indicate, Sprint is launching enhanced 911 services throughout the United States at a rapid pace. While LEC and PSAP readiness issues continue to present challenges in certain areas, deployment rates remain steady. It must be noted, however, that the vast majority of PSAPs have not requested the deployment of either Phase I or II services. Sprint deployed the network systems necessary to support Phase II service nationwide more than two years ago. As of the end of this past quarter, Sprint had distributed more than 29 million GPS enabled handsets. Despite this significant capital investment, ubiquitous deployment of these services does not appear to be likely any time in the near future. To confirm, Sprint cannot unilaterally deploy Phase I or Phase II services. Sprint will continue to work cooperatively with LECs, PSAPs, vendors, regulatory bodies and public officials to overcome remaining technical and administrative hurdles facing E911 deployment. Sprint urges the Commission to continue its efforts to ensure ubiquitous deployment of this important public safety technology.

TABLE OF CONTENTS

Summary.....	ii
I. Introduction.....	1
II. Recent Changes in FCC Reporting Requirements/ Modifications to Sprint's Report	3
III. Current Status of Phase I and II Requests.....	5
A. Phase I Status.....	5
B. Phase II Status.....	6
IV. Network Readiness	7
A. Lucent Markets.....	7
B. Nortel Markets.....	7
V. Current Handset Activations and Sales	8
VI. Compliance With Outstanding Benchmarks.....	9
VII. Affidavit Requirement.....	10
VIII. Conclusion.....	11

Appendices

- A. FCC Reporting Schedule
- B. Declaration of Kathy Walker, Executive Vice President – Network Services, Sprint

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules)	CC Docket No. 94-102
To Ensure Compatibility with)	
Enhanced 911 Emergency Calling Systems)	
<hr/>		

**SPRINT TWELFTH QUARTERLY
PHASE II IMPLEMENTATION REPORT**

Sprint Corporation, on behalf of its wireless operating company, Sprint Spectrum L.P., d/b/a Sprint PCS ("Sprint"), submits its Twelfth Quarterly Phase II Implementation Report in compliance with the Commission's October 12, 2001 *Sprint Waiver Order*.¹

I. INTRODUCTION

Sprint once again demonstrated its commitment to the deployment of E911 services by completing more than 100 Phase II PSAP launches and more than 60 Phase I launches during the third quarter of 2004.² Although Phase I and II service deployment continues at a steady pace, issues surrounding LEC cost recovery and PSAP readiness continue to present difficulties. Sprint again reminds the Commission that it cannot unilaterally deploy enhanced 911 services and that the rate of enhanced 911 deployments depends upon numerous factors outside of Sprint's control. Sprint encourages the Commission to seek ways of increasing E911 deploy-

¹ See, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Request for Waiver by Sprint Spectrum L.P. d/b/a Sprint*, 16 FCC Rcd 18330 (2001) ("Sprint Waiver Order").

² Sprint launched 68 new Phase I PSAPs and 106 new Phase II PSAPs during the third quarter of 2004.

ment and addressing the vast majority of PSAPs that have to date failed to even request Phase I or II services.

Sprint continues to be a leader in 911 services as it assists in industry and PSAP efforts to address outstanding issues surrounding wireless enhanced 911. Sprint is active in both the Emergency Services Interconnection Forum ("ESIF"), serving as an industry advisor on the ESIF management team, and the Network Reliability and Interoperability Council ("NRIC"), serving on three of the four focus groups addressing E911 issues: Near Term, Long Term and Network Operations. Finally, Sprint has worked actively with numerous PSAP and industry forums such as SWAT, the FCC's Coordination Initiative, and the Congressional 911 Caucus.

This report contains information regarding the current status of Sprint's enhanced 911 deployment efforts and does not attempt to duplicate information provided to the Commission in previous filings. The Commission should consult Sprint's previous Quarterly E911 Reports and filings in this docket for additional information regarding the issues surrounding the deployment of Phase I and II services and Sprint's activities. To the extent information contained in previous Sprint E911 implementation reports remains relevant to Sprint's compliance efforts, Sprint hereby incorporates those filings herein by reference.³

³ See, *In the Matter of Revision of the Commissions Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Joint Sprint PCS Phase II Implementation Report (November 9, 2000); Sprint PCS First Quarterly E911 Implementation Report, (February 1, 2002); Sprint May 2002 Third quarterly E911 Implementation Report (April 29, 2002); Sprint Quarterly E911 Implementation Report (August 1, 2002); Sprint Quarterly E911 Implementation Report (November 1, 2002); Sprint Corporation Quarterly E911 Implementation Report (February 1, 2003); Sprint Corporation Quarterly E911 Implementation Report (May 1, 2003); Sprint Corporation Seventh Quarterly E911 Implementation Report (August 1, 2003); Sprint Corporation Eighth Quarterly E911 Implementation Report (November 1, 2003); Sprint Corporation Ninth Quarterly E911 Implementation Report (February 2, 2004); Sprint Corporation Tenth Quarterly E911 Implementation Report (May 3, 2004); Sprint Corporation Eleventh E911 Implementation Report (August 2, 2004).

II. RECENT CHANGES IN FCC REPORTING REQUIREMENTS/MODIFICATIONS TO SPRINT'S REPORT

On July 23, 2004, seven days prior to the previous quarterly filing deadline, the FCC's Wireless Telecommunications Bureau announced changes to the FCC's Master Public Safety Answering Point (PSAP) Registry and the manner in which PSAP deployments should be reported.⁴ Among the changes made were the addition of new PSAP identification numbers, modifications to naming conventions, re-categorization of PSAPs as secondary or primary and the identification of PSAPs "orphaned" due to changes in status (e.g., consolidation of a primary PSAP into another PSAP). As a result of these changes, Sprint has conducted an extensive review of the attached Appendix A in an attempt to ensure that its report is consistent with the Commission's PSAP registry. Ambiguities continue to exist, however, regarding the Commission's reporting requirements.

Because the FCC modified the status of certain PSAPs as primary, secondary or "orphaned," the manner in which the number of deployed PSAPs should be identified in this document was unclear. Sprint contacted the FCC regarding the reporting format and was directed to continue reporting all deployed PSAPs, including secondary and orphaned PSAPs, although the FCC would use only primary PSAP numbers for its own assessments. Accordingly, Sprint will continue to report on all PSAPs listed on the registry, even if those PSAPs have subsequently been identified as secondary or orphaned. If the Commission later desires reporting to be completed in a different manner, Sprint will revise reports, and it encourages the Commission to provide such direction well in advance of the next quarterly report filing.

⁴ See, "Wireless Telecommunications Bureau Announces Updates and Enhancements to FCC's Master Public Safety Answering Point (PSAP) Registry," Public Notice, CC Docket No. 94-102, DA 04-2255 (July 23, 2004).

In the course of auditing Sprint's report to conform to the Commission's revised PSAP registry, Sprint identified a number of other ambiguities in the reporting format. For example, the Commission provided Sprint an exceptions report in which it noted Sprint's failure to identify the Puerto Rico PSAP's county designation. To Sprint's knowledge, however, Puerto Rico does not have county designations and no such information can be provided in that field.

Sprint also discovered during the course of this review that the tracking of E911 deployment information over the past five years was not always done in a consistent manner by the dozens of analysts processing E911 deployment requests. The FCC's reporting guidelines provide no specific direction on such matters. For example, some analysts had used the date a PSAP request was received to populate the "Date PSAP Request Made" field, while others reported the date indicated on the PSAP correspondence. These dates were reviewed and revised in this report. All dates should now reflect the date of the PSAP letter rather than the date the letter was in fact received.⁵

In other areas, Sprint discovered there were inconsistencies regarding the date a system was determined to be deployed. Some analysts reported deployment as complete when the system test with the LEC and PSAP was successfully completed. Other analysts reported deployment only when final drive testing of every cell site had been completed.⁶ Sprint has updated these dates as well. Sprint has attempted to ensure that all dates reflect the date that drive testing was completed, although review of these dates is continuing.

⁵ These dates can vary substantially, particularly where a PSAP sends its request to a retail store or to some other Sprint entity not involved in wireless services. Indeed, in some circumstances, Sprint has proceeded with deployments even where the PSAP has apparently not provided a formal written request.

⁶ For example, in the Nashville, Tennessee area, the date system testing was completed was previously reported as the deployment date, although drive testing of all cell sites was not completed until a later date. Those dates have now been updated.

Finally, the date that a PSAP deployment is projected for completion cannot always be identified. There are circumstances in which PSAPs have placed a request for services but have subsequently placed their request on hold due to issues surrounding installation of their PSAP CPE or LEC upgrade issues. In these circumstances, Sprint may only be able to indicate that the PSAP has placed their deployment on hold. Sprint continues to move forward with these requests, effectively treating them as valid and subject to an agreed upon implementation deadline. Specific dates, however, may not be available. Again, if the Commission desires this information to be reported in a different manner, Sprint will revise reporting, and it encourages the FCC to provide guidance on such matters well in advance of the next quarterly report to facilitate the administrative requirements associated with revising the associated spreadsheets.

III. CURRENT STATUS OF PHASE I AND II REQUESTS

The *Sprint Waiver Order* specified that this Sprint quarterly report “must include information on all pending Phase I and Phase II requests.”⁷ Sprint provides this information below.

A. Phase I Status

Sprint has worked cooperatively with PSAPs across the country to deploy Phase I (cell site/sector location) E911 services. It has accommodated Phase I requests regardless of PSAP technology choices and has utilized CAS, NCAS and Hybrid CAS/NCAS (*i.e.*, LEC) solutions. As of September 30, 2004, Sprint is providing Phase I E911 services to approximately 2,200 PSAPs in portions of forty-two states and the District of Columbia, which represents the addition of approximately 68 Phase I systems from last quarter. Details regarding the status of Phase I requests are contained within Appendix A.

⁷ *Sprint Waiver Order* at ¶ 28.

The "Date PSAP Made Request" column in Appendix A indicates the date of the PSAP letter, even if the PSAP did not at that time meet the prerequisites of Rule 20.18. Sprint's objective is to deploy Phase I with as many PSAPs as possible. Accordingly, Sprint has not attempted to segregate those requests as valid or invalid under the prerequisites contained in Rule 20.18, but has attempted to move forward on all requests. Where deployment is not possible within six months of a request, Sprint has established an agreed upon deployment schedule as permitted under the Commission's *Richardson Reconsideration Order*.⁸ At the Commission's request, Sprint will provide additional information with respect to specific deployments and PSAP circumstances presented in each case.

B. Phase II Status

Sprint continues to deploy Phase II systems at a steady pace. Although PSAP readiness and LEC cost recovery issues continue to hamper deployment in some areas, the number of areas impacted by these problems has been declining and deployment of Phase II systems has been increasing. Sprint launched 106 new PSAPs in the last quarter bringing total deployments to 1,147 in portions of thirty-two states and the District of Columbia. Details regarding the status of specific Phase II requests are contained in Appendix A attached hereto.

Sprint has not attempted to segregate Phase II requests based upon validity under the *Richardson Order*, and has moved forward with implementation efforts in all requesting PSAPs. Moreover, Sprint has reached an agreed upon implementation schedule with each of the Phase II requesting PSAPs as permitted under the *Richardson Reconsideration Order* and accordingly, Sprint is in compliance with the Commission's rules regardless of the validity of a given request. To confirm, however, where a PSAP has made a Phase II request, and the ALI provider has not

⁸ *In the Matter of Petition of City of Richardson Texas*, Order on Reconsideration, CC Docket 94-102,

upgraded its ALI database, or prohibits the use of that ALI database contingent upon tariff approval, the PSAP is unable to receive or utilize Phase II information. As Sprint has noted in previous filings, a PSAP will be unable to receive Phase II data unless the necessary ALI and CPE upgrades have been performed.⁹

IV. NETWORK READINESS

The *Sprint Waiver Order* specified that this quarterly report contain a statement whether “Sprint has completed its Phase II conversion of all Lucent switching software” by May 30, 2002, and “whether Sprint has completed its Phase II conversion of all Nortel switching software” by August 1, 2002. Sprint not only completed these network upgrades by the FCC’s benchmark dates, it completed the required installation of all national platforms and upgrades to its network infrastructure ahead of the Commission’s schedule. Sprint’s entire national network has now been Phase II enabled for more than two years.

A. Lucent Markets

Sprint completed installation of switch software upgrades in all of its Lucent markets on March 6, 2002, almost three months in advance of the Commission’s May 30, 2002 deadline.

B. Nortel Markets

Sprint completed installation of switch software upgrades in all of its Nortel markets on June 14, 2002, over a month and a half in advance of the Commission’s August 1, 2002 deadline.

FCC 02-318, (November 26, 2002) ¶29.

⁹ See Sprint Reply Comments in Support of its Petition for Reconsideration and Clarification, CC Docket No. 94-102 (Jan. 28, 2002).

V. CURRENT HANDSET ACTIVATIONS AND SALES

The *Sprint Waiver Order* specified that this Sprint quarterly report “must also include information on current handset models being activated or sold that are GPS-capable and important events effecting location-capable handset penetration levels, such as introduction of new handset models.”¹⁰

Sprint set a new standard for the industry by becoming the first carrier to effectively meet the Commission’s 100% new activation requirement during the third quarter of 2003. For the week ending June 28, 2003, 99.5% of new handset activations from all Sprint controlled outlets were GPS enabled. 93.7% of *all* handset activations, including used handsets, older models and handsets sold through third party outlets, were GPS enabled.¹¹ Sprint has introduced more than forty GPS enabled handset models since October 1, 2001. Indeed, many of the early GPS handset models have been retired as obsolete. All new handset models introduced by Sprint are GPS enabled, and have been since January of 2003. With the exception of an extremely limited amount of older inventory purchased prior to that date, all Sprint handset models are GPS enabled. As of the end of the third quarter of 2004, Sprint had sold over 29 million GPS-enabled handsets.

¹⁰ *Sprint Waiver Order* at ¶ 28.

¹¹ FCC rules exclude older models and refurbished models from the benchmark calculation. *See Fourth E911 Order*, 15 FCC Rcd 17442, 17455 n.62 (2000)(“The new handset activation benchmarks apply only to new handsets, not to new activations of older model or refurbished handsets.”). Because reactivations of used handsets are not tracked in the same manner as total gross activations, the exact percentage of GPS enabled new handset activations (the benchmark measurement) required separate calculation. A sample study of handset sales for the first two weeks of June showed that approximately 10% of total gross additions were in fact reactivations of previously used handsets. As would be expected, the majority of these reactivated/used handsets were older non-GPS enabled models. Once these handsets are eliminated from total gross activations, as required under the rules, the GPS enabled new handset activation rate for all outlets, including third party retailers, was 98.13%.

VI. COMPLIANCE WITH OUTSTANDING BENCHMARKS

The *Sprint Waiver Order* specified that this Sprint report “must also contain statements regarding whether Sprint PCS has met each deployment benchmark and, if not, the reasons for its failure to comply.”¹²

Sprint has met all benchmarks passed, to date, including the revised benchmark for compliance with the Commission’s requirement that 100% of new handset activations be GPS enabled by June 30, 2003 (with the clarifications outlined above).¹³ Specifically, Sprint began selling GPS handsets by October 1, 2001. Sprint met the interim benchmark that 25% of handset activations be GPS enabled by July 31, 2002.¹⁴ Sprint completed network upgrades to its Lucent and Nortel switches well before the Commission deadlines of May 30, 2002 and August 1, 2002. The Commission also ordered Sprint to provide service to all PSAPs who had made a valid request on or before June 30, 2002, by December 31, 2002. The majority of requests received prior to June 30, 2002 would be considered invalid under the rules in effect at the time the requests were issued, because the PSAP was unable to receive or utilize Phase II information. The validity of these requests should no longer be an issue, however, because Sprint has reached agreement with all Phase I and II requesting PSAPs regarding implementation as permitted under

¹² *Sprint Waiver Order* at ¶ 28.

¹³ See, *In the Matter of Request for a Limited and Temporary Rule Waiver by Sprint*, FCC 03-133, Order, CC Docket 94-102 (June 16, 2003)

¹⁴ The Commission’s Waiver Order is ambiguous regarding the manner in which compliance with the July 31, 2002, 25% activation rate was to be calculated. At least one interpretation of the Order is that compliance should be determined based upon the percentage of GPS enabled handsets sold between July 31, 2002 through December 30, 2002. See, Waiver Order, ¶28. Under this interpretation, Sprint exceeded the benchmark by a large margin.

the *Richardson Reconsideration Order*. Accordingly, Sprint is in compliance with the *Sprint Waiver Order*.¹⁵

The *Sprint Waiver Order* also directed Sprint to provide a statement regarding the accuracy milestone. The rules provide that handset-based location solutions must provide the location of wireless 911 calls with an accuracy of 50 meters for 67 percent of calls and 150 meters for 95 percent of calls.¹⁶ Prior to deploying the assisted GPS solution, Sprint conducted testing in conjunction with its vendors to determine whether the system would meet FCC standards. After deploying the system, Sprint has conducted periodic field tests in various markets to ensure the system is operating properly. Finally, Sprint tests each new GPS handset model as it is introduced into the market to ensure that it meets expected performance parameters. Based upon this information, Sprint believes that its current location technology satisfies the FCC's accuracy requirements.

VII. AFFIDAVIT REQUIREMENT

The *Sprint Waiver Order* specifies that Sprint "must support each Quarterly Report with an affidavit, from an officer or director of Sprint, attesting to the truth and accuracy of the report."¹⁷ Appendix B is the conforming Declaration of Kathy A. Walker, Executive Vice President – Network Services, Sprint.

¹⁵ With respect to a Phase I request outside of the Sprint Waiver Order, on October 24, 2004, the Enforcement Bureau of the FCC issued a Notice of Apparent Liability ("NAL") finding that Sprint PCS had failed to provide Phase I service within six months of a request by Santa Cruz County, Arizona ("Santa Cruz") in violation of rule 20.18(d). *In the Matter of Sprint Spectrum L.P. d/b/a Sprint PCS*, Notice of Apparent Liability for Forfeiture, EB-04-SE-054, (October 24, 2004). Specifically, the Enforcement Bureau alleges that Sprint was four weeks late in implementing Phase I service. Sprint will be addressing this issue further with the Bureau.

¹⁶ 47 C.F.R. § 20.18(h)(2).

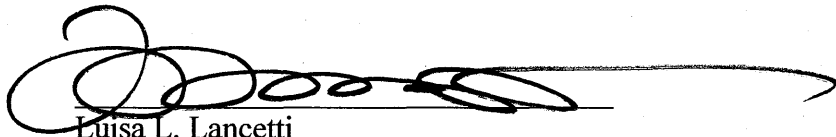
¹⁷ *Sprint Waiver Order* at ¶ 28.

VIII. CONCLUSION

Sprint remains a leader in E911 deployment efforts. Through this report, Sprint provides the Commission with updated information concerning its activities in this important area.

Respectfully submitted,

**SPRINT CORPORATION on behalf of
SPRINT SPECTRUM L.P., d/b/a Sprint PCS**

A handwritten signature in black ink, appearing to read 'L. Lancetti', with a long horizontal flourish extending to the right.

Luisa L. Lancetti
Vice President, Wireless Regulatory Affairs
Charles W. McKee
General Attorney

SPRINT CORPORATION
401 9th Street, N.W., Suite 400
Washington, D.C. 20004
202-585-1949

November 1, 2004